

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In Re:)	
)	
CHRISTOPHER WAYNE GLENN)	Case No. 23-30132
)	
aka Christopher Glenn)	Chapter 11
)	Subchapter V
)	
)	
Debtor)	

INITIAL POST-CONFIRMATION APPLICATION OF THOMAS J. KAPUSTA FOR SUBCHAPTER
V TRUSTEE FEES AND EXPENSES

Thomas J. Kapusta, in his capacity as the Sub Chapter V Trustee d/b/a TK Enterprises, LLC.

{"Applicant"}, pursuant to 11 U.S.C. §§ 330 and 331, hereby requests that the Court approve its

Application and enter an Order thereby awarding certain Sub Chapter V Trustee 's fees and expenses incurred in connection with this case. In support thereof, Applicant respectfully represents:

1. Applicant is the Sub Chapter V Trustee of record for the Chapter 11 proceeding and has acted as such since being appointed same on April 26, 2023.
2. Thomas J. Kapusta is manager and sole member of TK Enterprises, LLC. Thomas J. Kapusta has over 40 years of experience as a practicing attorney in multiple jurisdictions.
3. Applicant has expended time in the form of professional services in support of this Chapter 11 Sub Chapter V proceeding. This time has been itemized on records reflecting the work

performed by the Applicant during the period covered by this Second Interim Application.

Attached hereto as Exhibit "A" are the time records/invoicing (Invoice #Glenn112) related to the services, setting forth the date of each service, a description of the service rendered, and the time spent rendering such service at a rate of \$275.00 per hour plus expenses noted, and the resulting fee charge on account of the service listed.

4. Applicant has listed on Exhibit "A" any expenses incurred directly in connection with Applicant's duties as Sub Chapter V Trustee of this proceeding and were necessary to Applicant's services.
5. This initial post-confirmation application includes fees and expenses in the aggregate amount of \$ 632.25 including expenses in the amount of \$82.25 for the period of November 4, 2023, through September 12, 2024, that have not been previously applied for or approved for payment.
6. Work on this case during the time concerned has involved services from the Applicant related to the: (i) review, evaluation and verification of the Debtor's Schedules and Statements as required under 11 U.S.C. §521; (ii) meeting with the United States Trustee's office and court including the Initial Debtor Interview; the first meeting of creditors; working with Debtor Counsel and with Debtor and debtors creditors, (iii) reviewing any Debtor monthly operating reports; (iv) and general work including financial analysis, review of motions and responding to inquiries, meeting with applicable creditors and debtor counsel regarding the Chapter 11 Sub Chapter V proceeding.
7. The undersigned trustee represents to the Court that the services and expenses provided during the period covered by this Initial Post-Confirmation Fee Application were ordinary and necessary given the nature of this Chapter 11 Sub Chapter V proceeding, and that no work was excessive or detrimental to the Bankruptcy Estate.
8. Further, the Court executed an order that Subchapter V Trustee shall only need to provide notice

to Debtor, Counsel for Debtor, the United States Trustee, creditors receiving payments under Debtor's confirmed plan and any other party or its counsel registered to receive notice via ECF in this case (docket entry 107). See Exhibit B for list of plan creditors.

9. Applicant further requests that the Court, pursuant to 11 U.S. C. §, 330 and 331, approve the allowance of fees and expenses as ought in this Initial Post-Confirmation Fee Application and authorize the Debtor, as debtor in possession, to pay the balance of such fees and expenses as approved by the Court to the Applicant as funds are available in the DIP account maintained by the Debtor.

WHEREFORE, Applicant prays that the Court, pursuant to 11 U.S.C. § 330 and 331, enter an Order approving the Initial Post-Confirmation Application for Fee and Expenses of the Applicant, and award compensation for services rendered and expenses in the amount of \$632.25 for the period covered in the Initial Post-Confirmation Application, and direct the Debtor to pay the balance of such fees and expenses to the Applicant from the debtor account without adversely affecting the ability of the Debtor to perform the obligations of the Debtor under the Plan, and for any and all other relief deemed just and equitable in the premises.

Dated: September 21, 2024

Signed: /s/Thomas Kapusta
Thomas Kapusta, Sub Chapter V Trustee
TK Enterprises, LLC
PO Box 90624
Sioux Falls, SD 57109
Phone: 605-376-6715
Email: tkapusta@aol.com

Thomas J Kapusta		EXHIBIT A
TK Enterprises, LLC		
Subchapter V Trustee		
PO Box 90624	Phone: 605-376-6715	
Sioux Falls, SD 57109	tkapusta@aol.com	

Bill To: Christopher Wayne Glenn c/o Attorney Maurice VerStandig The Dakota Bankruptcy Firm
 Address: The 1630 1st Avenue N., Suite B PMB 24, Fargo, ND 58102
 Phone: 701-394-3215 Invoice #: Glenn 112
 Email: mac@mbvesq.com Invoice Date: September 21, 2024

Case Name: Christopher Wayne Glenn, aka Christopher Glenn

Case #: 23-30132

Date	Services	Time Spent	Fee Total
11/4/2023	Prepare and submit monthly report to US Trustee Office	.1 hr	\$27.50
12/8/2023	Prepare and submit monthly report to US Trustee Office	.1 hr	\$27.50
1/3/2024	Prepare and submit monthly report to US Trustee Office	.1 hr	\$27.50
1/17/2024	Receive and respond to communication from debtor's creditor regarding status of plan payments with cc: USTO	.1 hr	\$27.50
6/14/2024	Review entry 111	.1 hr	\$27.50
7/1/2024	Review entry 112	.1 hr	\$27.50
7/2/2024	Review entry 113	.1 hr	\$27.50
7/23/2024	Review entry 114	.1 hr	\$27.50
8/8/2024	Review entries 117-118 and prepare and file no reply objection	.4 hr	\$110.00
8/10/2024	Review entries 119-121	.4 hr	\$110.00
8/13/2024	Review entry 122	.1 hr	\$27.50
8/14/2024	Review entries 123-125	.1 hr	\$27.50
9/9/2024	Review entry 126	.1 hr	\$27.50
9/12/2024	Review entry 127	.1 hr	\$27.50
		subtotal	\$550.00
		Expenses (service)	\$82.25
DUE UPON RECEIPT.			
Make all checks payable to Thomas J Kapusta.		TOTAL	\$632.25

TRUSTEE SIGNATURE: ss/Thomas J. Kapusta
 Date: September 21, 2024

A - List of Creditors by Class Page 1 of 1

Class	Claim Number	Claimant	Amount	Secured Sum	Priority Sum	Undisputed Unsecured Sum	Undisputed Sum	Objection
1	15	Wells Fargo Bank, N.A.	\$109,745.45	\$109,745.45	\$0.00	\$0.00	\$109,745.45	
1	n/a	First International Bk	\$619,218.00	\$619,218.00	\$0.00	\$0.00	\$619,218.00	
2	20	Ford Motor Credit Company LLC	\$66,942.55	\$66,942.55	\$0.00	\$0.00	\$66,942.55	
3	1	ACAR Leasing LTD d/b/a GM Financial Leasing	\$23,006.42	\$0.00	\$0.00	\$23,006.42	\$23,006.42	
4	2	JPMorgan Chase Bank, N.A.	\$26,630.78	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	3	JPMorgan Chase Bank, N.A.	\$22,932.82	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	4	JPMorgan Chase Bank, N.A.	\$12,616.25	\$0.00	\$0.00	\$12,616.25	\$12,616.25	
4	5	Mccody Concrete Products	\$6,306.72	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	6	CM HEAVYMACHINERY, LLC	\$500,000.00	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	7	Automotive & Industrial Distributors of Billings	\$2,862.69	\$0.00	\$0.00	\$2,862.69	\$2,862.69	
4	8	Discover Bank	\$724.84	\$0.00	\$0.00	\$724.84	\$724.84	
4	9	American Express National Bank	\$5,010.51	\$0.00	\$0.00	\$5,010.51	\$5,010.51	
4	10	American Express National Bank	\$5,108.78	\$0.00	\$0.00	\$5,108.78	\$5,108.78	
4	11	State of Delaware Division of Revenue	\$302,037.18	\$0.00	\$0.00	\$0.00	\$0.00	DE #40
4	12	Wells Fargo Bank, N.A.	\$11,146.31	\$0.00	\$0.00	\$11,146.31	\$11,146.31	
4	13	Capital One N.A.	\$2,768.92	\$0.00	\$0.00	\$2,768.92	\$2,768.92	
4	14	United Rentals (North America), Inc.	\$36,814.68	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	16	Internal Revenue Service	\$11,131.02	\$0.00	\$0.00	\$11,131.02	\$11,131.02	
4	17	Airgas USA, LLC	\$1,844.33	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	18	Airgas USA, LLC	\$1,620.68	\$0.00	\$0.00	\$0.00	\$0.00	DE #42
4	19	Kirby-Smith Machinery, Inc.	\$93,305.97	\$0.00	\$0.00	\$0.00	\$0.00	
4	21	Border States Industries, Inc.	\$407,163.77	\$0.00	\$0.00	\$0.00	\$0.00	DE #44
4	22	LightStream, a division of Truist Bank	\$40,012.26	\$0.00	\$0.00	\$40,012.26	\$40,012.26	
4	24	Airgas USA, LLC	\$12,853.26	\$0.00	\$0.00	\$0.00	\$0.00	DE #46
4	n/a	Brand Source/Citi Bank	\$3,500.00	\$0.00	\$0.00	\$3,500.00	\$3,500.00	
4	n/a	Citibank	\$5,170.00	\$0.00	\$0.00	\$5,170.00	\$5,170.00	
4	n/a	Mohela/Dept. of Ed.	\$9,725.00	\$0.00	\$0.00	\$9,725.00	\$9,725.00	
5	23	Lund Oil, Inc.	\$65,000.00	\$65,000.00	\$0.00	\$0.00	\$65,000.00	
n/a	16	Internal Revenue Service	\$120,615.94	\$0.00	\$120,615.94	\$120,615.94	\$120,615.94	
Total			\$2,525,815.13	\$860,906.00	\$120,615.94	\$253,398.94	\$1,114,304.94	

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NORTH DAKOTA

In Re:)	
)	
CHRISTOPHER WAYNE GLENN)	Case No. 23-30132
)	
Aka Christoopher Glenn)	Chapter 11
)	Subchapter V
)	
)	
)	
Debtor)	

NOTICE OF INITIAL POST-CONFIRMATION APPLICATION OF THOMAS J. KAPUSTA
FOR SUBCHAPTER V TRUSTEE FEES AND EXPENSES

Thomas J. Kapusta, Subchapter V Trustee, has filed an application to be paid from the bankruptcy estate \$550.00 for compensation for fees and \$82.25 for reimbursement of expenses, for a total of \$632.25 in fees and expenses. Your rights may be affected. You should read the application and this notice carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to approve the application, you or your attorney have twenty-one (21) days to file a written objection with the Bankruptcy Clerk. The response must include the case name and case number and be signed and dated by you or your attorney. The response should also include your daytime telephone number or, if your attorney files the response, your attorney's telephone number. Only an attorney may file a response on behalf of a corporation, a partnership, or another formal legal entity.

If you are an attorney, you must file any response electronically. See additional information regarding electronic filing (CM/ECF) on the Court's website at www.ndb.uscourts.gov. If you are not an attorney, your response may be mailed or delivered to the Bankruptcy Clerk, whose address is 655 1st Avenue North, Suite 210, Fargo, North Dakota 58102-4932. The response must be mailed early enough to ensure the Bankruptcy Clerk receives it on or before the deadline stated above.

If you or your attorney files a response, you or your attorney must also mail a copy of the response to parties in interest who will not receive electronic notice of the response. You or your attorney may obtain the names and addresses of the parties in-interest listed in by contacting the Bankruptcy Clerk's office at (701) 297-7100.

A hearing on the application may be set by separate order if a response is filed on or before the deadline stated above. If you or your attorney files a response to the application on or before the

deadline stated above, the Court will call you or your attorney at the scheduled hearing time using the telephone number provided in the response. If an evidentiary hearing is needed, the Court will set the date, time, and place for the evidentiary hearing during the telephonic hearing. Only an attorney may represent a corporation, a partnership, or another formal legal entity at a hearing.

If no one files a response on or before the deadline stated above, the Court may enter an order granting the application without a hearing.

Dated: September 21, 2024

Signed: s/Thomas J. Kapusta

Thomas J. Kapusta
Sub Chapter V Trustee
TK Enterprises, LLC
PO Box 90624
Sioux Falls, SD 57109
Phone: 605-376-6715
email: tkapusta@aol.com